

**FILED**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
MIDLAND-ODESSA DIVISION**

**JAN 24 2018**  
CLERK, U.S. DISTRICT CLERK  
WESTERN DISTRICT OF TEXAS  
BY *LW* DEPUTY

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**V.**

**2. SARA EUGENIA GALLEGOS,**

**Defendants.**

**CRIMINAL NO. MO-17-CR-136(2)  
SUPERSEDING INDICTMENT**

**[Vio: 21 U.S.C. § 841(a)(1)-  
Possession With Intent to  
Distribute a Controlled  
Substance  
18 U.S.C. § 2 – Aid and Abet;  
18 U.S.C. § 924(c) – Possession of firearm  
in furtherance of a drug trafficking crime]**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]**

That on or about June 19, 2017, in the Western District of Texas, the Defendant,

**2. SARA EUGENIA GALLEGOS,**

aided and abetted by EMILIO TURRUBIARTEZ JR., unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, which offense involved fifty (50) grams or more of actual methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

**COUNT TWO**

**[18 U.S.C. §§ 924(c) and 18 U.S.C. § 2]**

That on or about June 19, 2017, in the Western District of Texas, the Defendant,

**2. SARA EUGENIA GALLEGOS,**

aided and abetted by EMILIO TURRUBIARTEZ JR., did intentionally and knowingly possess firearms, to wit: a .38 Special Taurus Revolver, a Raven Arms .25 Automatic handgun, a Jimenez

.380 caliber handgun, and a Colt 1911 handgun, .45 caliber, CN Romarm AK 7.62X39, and a AR-15 bearing Serial Number 15188305, in furtherance of the drug trafficking crimes set forth in Count One and Three of this Indictment, which drug trafficking counts are incorporated by reference herein as if set forth in full, in violation of Title 18, United States Code, Section 924(c) and Title 18, United States Code, Section 2.

**COUNT THREE**

**[21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]**

That beginning on or about December 1, 2016 and continuing until on or about June 19, 2017, in the Western District of Texas, the Northern District of Texas, and elsewhere, the Defendant,

**2. SARA EUGENIA GALLEGOS,**

did combine, conspire, confederate and agree with EMILIO TURRUBIARTEZ JR. and others known and unknown to the Grand Jury to possess with intent to distribute and distribute a controlled substance, which offense involved fifty (50) grams or more of actual methamphetamine, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), in violation of Title 21, United States Code, Section 846.

**COUNT FOUR**

**[18 U.S.C. § 922(g)(1)]**

That on or about June 19, 2017, in the Western District of Texas, the Defendant,

**2. SARA EUGENIA GALLEGOS,**

who having been convicted of a crime punishable by imprisonment for a term exceeding one year, namely for the felony offense of Transport and/or Sell of a Dangerous Drug in Cause Number CR-2009-008280002 on or about February 17, 2010 in the Superior Court of the State of Arizona, County of Maricopa, RCC -- Downtown, did knowingly possess in and affecting commerce firearms, to wit: a

Raven Arms .25 Automatic handgun, a Jimenez .380 caliber handgun, and a Colt 1911 handgun, which all had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL.

JOHN F. BASH  
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'Brandi Young', is written over the printed name.

BRANDI YOUNG  
Assistant United States Attorney

**Original signed by the  
foreperson of the Grand Jury**